

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED  
RICHARD W. WILSON  
CLERK OF COURT

2017 MAY 19 AM 9:23

SOUTHERN DISTRICT OF OHIO  
WEST DIV CINCINNATI

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC ZYN HO,

and

BRYAN MATHEW OTERO,

CASE NO.

**1117CR 057**

JUDGE

**DLOTT**

INDICTMENT

18 U.S.C. §§ 1591(a)(1) and 1594(c)

18 U.S.C. § 2251(a) and (e)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Sex Traffic Children)

From a time unknown through on or about May 2, 2017, in the Southern District of Ohio and elsewhere, the defendants, **ERIC ZYN HO** and **BRYAN MATTHEW OTERO**, did knowingly conspire and agree to together and with each other and with other persons both known and unknown to the grand jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, that being "Minor Victim," at the time a 14 year old female, knowing and in reckless disregard of the fact that "Minor Victim A" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

**In violation of Title 18 United States Code, Sections 1591(a)(1) and 1594(c).**

**COUNT TWO**

**(Conspiracy to Produce Child Pornography)**

From a time unknown, through on or about May 2, 2017, in the Southern District of Ohio and elsewhere, the defendants, **ERIC ZYN HO** and **BRYAN MATTHEW OTERO**, did knowingly conspire and agree to together and with each other and with other persons both known and unknown to the grand jury, to knowingly employ, use, persuade, induce, entice, and coerce a minor, that being "Minor Victim," to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

**In violation of Title 18, United States Code, Sections 2251(a) and (e).**

A TRUE BILL.

  
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GRAND JURY FOREPERSON

**BENJAMIN C. GLASSMAN**  
**UNITED STATES ATTORNEY**

  
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**KYLE J. HEALEY**  
**ASSISTANT UNITED STATES ATTORNEY**